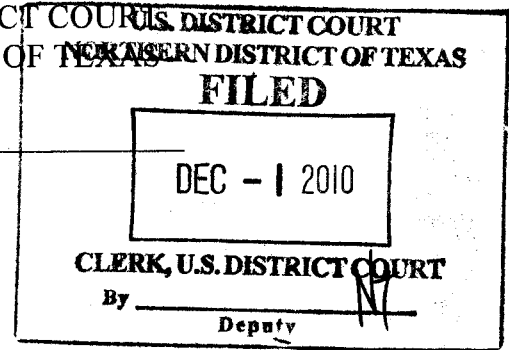


SEALED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA §  
v. § No. §  
HUTHAIFA AHMAD ALBARGHUTHI (01) §  
a/k/a Huthaifa Barghuthi §  
LOWANA MOHAMMAD AWAD (02) §  
a/k/a Lowana Albarguthi §  
NAGHAM HASAN BURGOTTI (03) §  
a/k/a Nagham Hasan Abdelfattah §  
a/k/a Nagham Hasan Burguthi §  
MOHAMMAD ARAFEH ABUAWAD (04) §  
a/k/a Mohammad Arafef Awad §  
a/k/a Mohd Arafef Abuawad §  
ADAM MOHAMMAD BARGUTHI (05) §  
a/k/a Adham Barguthi §

TO BE FILED UNDER SEAL

8. - 10CR - 339 - N

INDICTMENT

The Grand Jury Charges:

Count One

**Forced Labor Conspiracy**

**(Violation of 18 U.S.C. § 1594(b) (18 U.S.C. § 1589))**

1. Beginning in or around late 2006 and continuing until in or around April 2009, in the Northern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi** did knowingly combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury to provide and obtain the labor and services of S.H., a Sri Lankan woman, by means

of threats of serious harm to S.H.; by means of abuse and threatened abuse of the law or legal process; and by means of a scheme, plan, and pattern intended to cause S.H. to believe that, if S.H. did not perform such labor or services, that S.H. would suffer serious harm.

In violation of 18 U.S.C. § 1594(b) (18 U.S.C. § 1589).

**Count Two**  
**Forced Labor and Attempted Forced Labor**  
**Aiding and Abetting**  
**(Violation of 18 U.S.C. §§ 1589, 1594 and 2)**

Beginning in or around late 2006 and continuing until sometime in 2008, in the Northern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi**, aiding and abetting each other, attempted to and did knowingly provide and obtain the labor and services of S.H., a Sri Lankan woman, by means of threats of serious harm to S.H.; by means of abuse and threatened abuse of the law or legal process; and by means of a scheme, plan, and pattern intended to cause S.H. to believe that, if S.H. did not perform such labor or services, that S.H. would suffer serious harm.

In violation of 18 U.S.C. §§ 1589, 1594 and 2.

**Count Three**  
**Forced Labor and Attempted Forced Labor**  
**Aiding and Abetting**  
**(Violation of 18 U.S.C. §§ 1589, 1594 and 2)**

Beginning sometime in 2008 and continuing until in or around April 2009, in the Northern District of Texas, Eastern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Nagham Hasan Burgotti, and Adam Mohammad Barguthi**, aiding and abetting each other, attempted to and did knowingly provide and obtain the labor and services of S.H., a Sri Lankan woman, by means of threats of serious harm to S.H.; by means of abuse and threatened abuse of the law or legal process; and by means of a scheme, plan, and pattern intended to cause S.H. to believe that, if S.H. did not perform such labor or services, that S.H. would suffer serious harm.

In violation of 18 U.S.C. §§ 1589, 1594 and 2.

**Count Four**  
**Conspiracy to Harbor for Financial Gain**  
**(Violation of 8 U.S.C. §§ 1324(a)(1)(A)(v and 1324(a)(1)(B)(i))**

Between in or around July 2007 and continuing through in or around April 2009, in the Northern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi**, knowing and willfully did combine, conspire, and agree together and with others known and unknown to the grand jury, knowing and in reckless disregard of the fact that S.H., an alien, came to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield S.H. from detection in their residence and elsewhere for the purpose of private financial gain.

In violation of 8 U.S.C. §§ 1324(a)(1)(A)(v) and 1324(a)(1)(B)(i).

**Count Five**  
**Harboring Alien for Financial Gain**  
**(Violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i))**

Between in or around July 2007 and continuing through sometime in 2008, in the Northern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi**, knowing and in reckless disregard of the fact that S.H., an alien, came to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield S.H. from detection in their residence and elsewhere for the purpose of private financial gain.

In violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

**Count Six**  
**Harboring Alien for Financial Gain**  
**(Violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i))**

Between sometime in 2008 and continuing through on or about April 22, 2009, in the Northern District of Texas, Eastern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Nagham Hasan Burgotti, and Adam Mohammad Barguthi**, knowing and in reckless disregard of the fact that S.H., an alien, came to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield S.H. from detection in their residence and elsewhere for the purpose of private financial gain.

In violation of 8 U.S.C. §§ 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

**Count Seven**  
**Document Servitude**  
**Aiding and Abetting**  
**(Violation of 18 U.S.C. §§ 1592 and 2)**

Between on or about January 23, 2007 and continuing through in or around April 2009, in the Northern District of Texas and elsewhere, defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi**, aiding and abetting one another, attempted to and did knowingly conceal, remove, confiscate, and possess the actual and purported passport and immigration documents of an individual known as S.H., a Sri Lankan national, in the course of a violation of 18 U.S.C. § 1589, with the intent to violate 18 U.S.C. § 1589; and to prevent or restrict or attempt to prevent or restrict, without lawful authority, S.H.'s liberty to move or travel, in order to maintain the labor and services of S.H. when S.H. was a victim of a severe form of trafficking in persons.

In violation of 18 U.S.C. §§ 1592, 1589 and 2.



**Forfeiture Notice**  
**[18 U.S.C. § 1594(d); 18 U.S.C. § 982(a)(6)]**

Upon conviction for either of the offenses alleged in Counts One and Four of this Indictment and pursuant to 18 U.S.C. § 1594(d), defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi** shall forfeit to the United States their respective interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the respective offense and any property, real or personal, constituting or derived from, any proceeds they obtained, directly or indirectly, as a result of the respective offense.

Upon conviction for either of the offenses alleged in Counts Two and Three of this Indictment and pursuant to 18 U.S.C. § 982(a)(6), defendants **Huthaifa Ahmad Albarghuthi, Lowana Mohammad Awad, Nagham Hasan Burgotti, Mohammad Arefeh Abuawad, and Adam Mohammad Barguthi** shall forfeit to the United States any conveyance, including any vessel, vehicle, or aircraft used in the commission of the respective offense; any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the respective offense; and any property, real or personal, used to facilitate, or intended to be used to facilitate, the commission of the respective offense.

This property includes, but is not limited to, the following:

1. The real property located at 6904 Meadow Bend, Arlington, Texas.

2. The business located at Tobacco Row, 601 West Parker Road #117, Plano, Texas, and all its property and inventory.
3. The business located at Tobacco Row, 4757 West Park Boulevard #102, Plano, Texas, and all its property and inventory.

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), if any of the above-referenced property subject to forfeiture, as a result of any act or omission of any of the defendants, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendants up to the value of the previously-described property subject to forfeiture.

A TRUE BILL

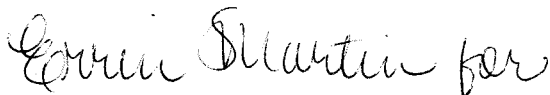
  
\_\_\_\_\_  
FOREPERSON

JAMES T. JACKS  
UNITED STATES ATTORNEY



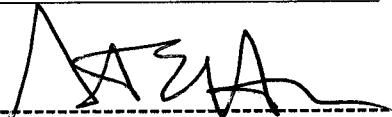
ERRIN MARTIN  
Assistant United States Attorney  
Texas State Bar No. 24032572  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.767.2916  
Email: [Errin.Martin@usdoj.gov](mailto:Errin.Martin@usdoj.gov)

THOMAS E. PEREZ  
ASSISTANT ATTORNEY GENERAL  
CIVIL RIGHTS DIVISION



CHRISTOPHER LOMAX  
Trial Attorney  
Civil Rights Division  
United States Department of Justice  
Washington, D.C.  
Telephone: 202.307.5743  
Facsimile: 202.514.8336  
Email: [Christopher.Lomax@usdoj.gov](mailto:Christopher.Lomax@usdoj.gov)

A true bill rendered



DALLAS

FOREPERSON

Filed in open court this 1<sup>ST</sup> day of December, 2010

Clerk

Arrest Warrant to Issue To All Defendants



UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal Complaint Pending

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**8 - 10CR - 339 - N**

THE UNITED STATES OF AMERICA

v.

HUTHAIFA AHMAD ALBARGHUTHI (01)

a/k/a Huthaifa Barghuthi

LOWANA MOHAMMAD AWAD (02)

a/k/a Lowana Albarghuthi

NAGHAM HASAN BURGOTTI (03)

a/k/a Naghham Hasan Abdelfattah

a/k/a Naghham Hasan Burguthi

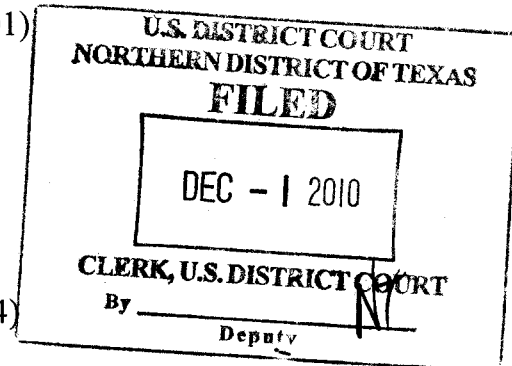
MOHAMMAD ARAFEH ABUAWAD (04)

a/k/a/ Mohammad Arafah Awad

a/k/a Mohd Arafah Abuawad

ADAM MOHAMMAD BARGUTHI (05)

a/k/a Adham Barguthi



SEALED INDICTMENT

18 U.S.C. § 1594(b), 18 U.S.C. § 1589  
Forced Labor Conspiracy

18 U.S.C. §§ 1589 and 1594 and 2  
Forced Labor and Attempted Forced Labor  
Aiding and Abetting

8 U.S.C. §§1324(a)(1)(A)(v and 1324(a)(1)(B)(i)  
Conspiracy to Harbor for Financial Gain

8 U.S.C. §§1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i)  
Harboring Alien for Financial Gain

18 U.S.C. §§1592 and 2  
Document Servitude  
Aiding and Abetting

18 U.S.C. § 1594(d); 18 U.S.C. § 982 (a)(6)  
Forfeiture Notice

7 Counts

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS

SEAL

## Related Case Information

Superseding Indictment: ☐ Yes ☒ No

New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:)

Search Warrant Case Number:

Rule 20 from District of:

3. - 10CR - 339 - N

Magistrate Case Number:

## 1. Defendant Information

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

HUTHAIFA AHMAD ALBARGHUTHI (1)

Alias Name

a/k/a Huthaifa Barghuthi

Address

County in which offense was committed:

Dallas

RECEIVED  
BY

DEC - 1 2010

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

## 2. U.S. Attorney Information

Errin Martin

Bar #: Texas No. 24032572

## 3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect:

## 4. Location Status ARREST WARRANT TO ISSUE

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

## 5. U.S.C. Citations

Total # of Counts as to This Defendant: 7

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 1594 (b), 18 U.S.C. § 1589

Forced Labor Conspiracy

1

18 U.S.C. §§1589, 1594 and 2

Forced Labor and Attempted Forced Labor,  
Aiding and Abetting

2-3

8 U.S.C. §§1324(a)(1)(A)(v and  
1324(a)(1)(B)(i)

Conspiracy to Harbor for Financial Gain

4

8 U.S.C. §§1324(a)(1)(A)(iii)and  
1324(a)(1)(B)(i)

Harboring Alien for Financial Gain

5-6

18 U.S.C. §§ 1592 and 2

Document Servitude, Aiding and Abetting

7

18 U.S.C. § 1594 (d);18 U.S.C.§982(a)(6) Forfeiture Notice

Date 11.30.2010

Signature of AUSA:

*Errin Martin*

ERRIN MARTIN

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment: ☐ Yes ☒ No

New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:3:09-CR-146-P)

Search Warrant Case Number: **3. - 10CR - 339 - N**

Rule 20 from District of: \_\_\_\_\_

Magistrate Case Number: \_\_\_\_\_

**1. Defendant Information**

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

LOWANA MOHAMMAD AWAD (2)

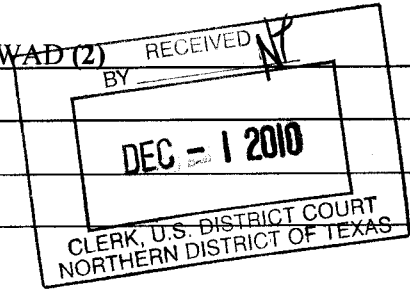
Alias Name

a/k/a "Lowana Albarguthi"

Address

County in which offense was committed:

Dallas



**2. U.S. Attorney Information**

Errin Martin

Bar # Texas 24032572

**3. Interpreter**

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status ARREST WARRANT TO ISSUE**

- ☐ Already in Federal Custody
- ☐ Already in State Custody
- ☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 5

☐ Petty

☐ Misdemeanor

☒ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 1594 (b), 18 U.S.C. § 1589	Forced Labor Conspiracy	1
18 U.S.C. §§1589, 1594 and 2	Forced Labor and Attempted Forced Labor, Aiding and Abetting	2
8 U.S.C. §§1324(a)(1)(A)(v and 1324(a)(1)(B)(i)	Conspiracy to Harbor for Financial Gain	4
8 U.S.C. §§1324(a)(1)(A)(iii)and 1324(a)(1)(B)(i)	Harboring Alien for Financial Gain	5
18 U.S.C. §§ 1592 and 2	Document Servitude, Aiding and Abetting	7
18 U.S.C. § 1594 (d);18 U.S.C. §982(a)(6)	Forfeiture Notice	

Date 11.30.2010

Signature of AUSA:

Errin Martin  
ERRIN MARTIN

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment: ☐ Yes ☒ No  
 New Defendant: ☒ Yes ☐ No  
 Pending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:3:09-CR-146-P)  
 Search Warrant Case Number: **8. - 10CR - 339 - N**  
 Rule 20 from District of: \_\_\_\_\_  
 Magistrate Case Number: \_\_\_\_\_

**1. Defendant Information**

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

**NAGHAM HASAN BURGOTTI (3)**

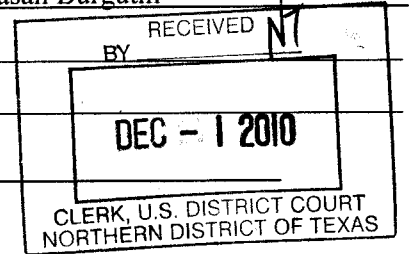
Alias Name

a/k/a "Nagham Hasan Abdelfattah"; a/k/a "Nagham Hasan Burguthi"

Address

County in which offense was committed:

Dallas



**2. U.S. Attorney Information**

Errin Martin

Bar # Texas 24032572

**3. Interpreter**

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status ARREST WARRANT TO ISSUE**

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 7

☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
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18 U.S.C. §§1589, 1594 and 2	Forced Labor and Attempted Forced Labor, Aiding and Abetting	2-3
8 U.S.C. §§1324(a)(1)(A)(v and 1324(a)(1)(B)(i)	Conspiracy to Harbor for Financial Gain	4
8 U.S.C. §§1324(a)(1)(A)(iii)and 1324(a)(1)(B)(i)	Harboring Alien for Financial Gain	5-6
18 U.S.C. §§ 1592 and 2	Document Servitude, Aiding and Abetting	7
18 U.S.C. § 1594 (d);18 U.S.C. §982(a)(6)	Forfeiture Notice	

Date 11.30.2010

Signature of AUSA:

Errin Martin  
 ERRIN MARTIN



**ORIGINAL**  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF TEXAS**

**Related Case Information**Superseding Indictment: ☐ Yes ☒ NoNew Defendant: ☒ Yes ☐ NoPending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:3:09-CR-146-P)

Search Warrant Case Number:

Rule 20 from District of:

Magistrate Case Number:

**1. Defendant Information**Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

MOHAMMAD ARAFEH ABUAWAD(4)

Alias Name

a/k/a "Mohammad Arafah Awad"; a/k/a/ "Mohd Arafah Abuawad"

Address

County in which offense was committed:

Dallas**2. U.S. Attorney Information**Errin MartinBar # Texas 24032572**3. Interpreter**☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status ARREST WARRANT TO ISSUE**

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

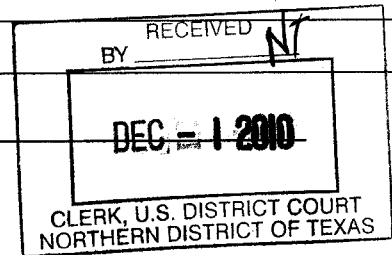
Total # of Counts as to This Defendant: 5

☐ Petty☐ Misdemeanor☒ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 1594 (b), 18 U.S.C. § 1589	Forced Labor Conspiracy	1
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18 U.S.C. §§ 1592 and 2	Document Servitude, Aiding and Abetting	7
18 U.S.C. § 1594 (d);18 U.S.C. §982(a)(6)	Forfeiture Notice	

Date 11.30.2010Signature of AUSA: Errin Martin

ERRIN MARTIN



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**SEALED**

**Related Case Information**

Superseding Indictment: ☐ Yes ☒ No

New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:3:09-CR-146-P)

Search Warrant Case Number: **8. - 10CR - 339 - N**

Rule 20 from District of: \_\_\_\_\_

Magistrate Case Number: \_\_\_\_\_

**1. Defendant Information**

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☒ Yes ☐ No

Defendant Name

ADAM MOHAMMAD BARGUTHI(5)

Alias Name

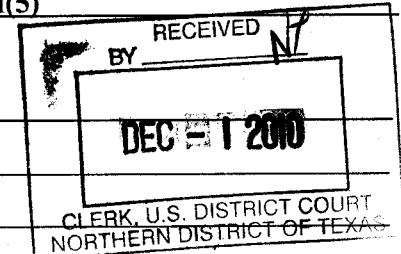
a/k/a "Adam Mohammad Barguthi

Address

\_\_\_\_\_

County in which offense was committed:

Dallas



**2. U.S. Attorney Information**

Errin Martin

Bar # Texas 24032572

**3. Interpreter**

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status ARREST WARRANT TO ISSUE**

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 7

☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
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8 U.S.C. §§1324(a)(1)(A)(v and 1324(a)(1)(B)(i)	Conspiracy to Harbor for Financial Gain	4
8 U.S.C. §§1324(a)(1)(A)(iii)and 1324(a)(1)(B)(i)	Harboring Alien for Financial Gain	5-6
18 U.S.C. §§ 1592 and 2	Document Servitude, Aiding and Abetting	7
18 U.S.C. § 1594 (d); 18 U.S.C. §982(a)(6)	Forfeiture Notice	

Date 11.30.2010

Signature of AUSA: Errin Martin

ERRIN MARTIN